U.S. Department of Transportation
United States Coast Guard

Supervisor
United States Coast Guard AK
Marine Safety Detachment

2030 Sealevel Drive, Suite 203
Ketchikan, AK 99901
Staff Symbol: Sup
Phone: (907) 225-4496
FAX: (907) 225-4499

16461
01/26/00

From: Federal On Scene Coordinator's Representative
To: Federal On Scene Coordinator, Southeast Alaska

Subj: TAMGAS HARBOR MARINE TRANSFER PIPELINE REMOVAL OPERATION

1. At 0800 hrs on Wednesday, 24 February 1999 Marine Safety Detachment (MSD) Ketchikan was informed by the Federal Aviation Administration (FAA) of an old fuel transfer facility located in Tamgas Harbor, Annette Island Alaska. According to the report, the FAA was concerned that the pipeline presented an threat of discharge due to their deteriorated condition. A site visit made by representatives of MSD confirmed this threat and on 25 March 1999, Commander David Eley, Commanding Officer of Marine Safety Office Juneau, initiated a Coast Guard Response under authority of the National Contingency Plan (40 C.F.R. 300.2). Response operations continued through May 1999, when the Federal On Scene Coordinator (FOSC) declared that all Coast Guard field activities had been completed.

2. The enclosed report is a summary of actions undertaken by the MSD in responding to this imminent and substantial threat. This report draws heavily on the documentary record of the response which the MSD compiled and is submitted to the FOSC for review. We are prepared to answer questions on matters contained in this report.

P. W. CLARK

Encl: (1) A Summary Report of the Tamgas Harbor Abandoned Marine Transfer Pipeline Removal Operation, dated 26 January 2000

A Summary Report of the Tamgas Harbor Abandoned Marine Transfer Pipeline Removal Operation

Prepared
by
P. W. CLARK,
Lieutenant, U.S. Coast Guard

Table of Contents

A. SITUATION

1. Background. Annette Island is located 15 miles south of Ketchikan in southern Southeast Alaska. The island has been declared an Indian reserve and has been the home to Metlakatla Indian Community since 1887. The Indian Reserve is the only one in Alaska, with the lands belonging to the Department of the Interior and administered through the Bureau of Indian Affairs (BIA). For a comprehensive overview of the area's history and associated environmental issues see Enclosure (1).

In 1940, the War Department obtained a permit to build an U.S. Army Air Corps facility and a minor Naval Facility on the southwest portion of Annette Island in an area adjacent to Tamgas Harbor. In 1946 the War Department leased portions of the facility to the Standard Oil Company of California. This leased included numerous fuel storage tanks, associated pipelines and all equipment necessary for operation of the storage and dispensing system (See tab 7 of enclosure (1)). Standard Oil later proposed and received permission to move several storage tanks from their original location to a point near the dock in Tamgas Harbor (See tab 8 of enclosure (1)).

During the early 1940's approximately six miles of pipeline and 35 fuel tanks (>1,000,000 gallons storage capacity) were constructed on Annette Island. Another one-half mile of fuel pipeline was used to supply fuel to government seaplanes operating in Tamgas Harbor at the minor Naval Facility. This pipeline was later abandoned in 1947 when Standard Oil moved several storage tanks to a point near the dock in Tamgas harbor and began distributing fuel from the new system.

The FAA terminated the lease for the Tank Farm near the main dock in 1974. The Tank Farm was then used by the Metlakatla Indian Community to distribute petroleum products. It is unclear what happened to the facility between this time and when the abandoned pipelines were brought to the attention of the U. S. Coast Guard's Marine Safety Detachment, Ketchikan, AK in 1999.

2. Situation Encountered. On 24 February 1999, personnel at U.S. Coast Guard Marine Safety Detachment (MSD) Ketchikan Alaska, received notification of a possible threat of discharge of oil from an abandoned marine transfer facility located in Tamgas Harbor on Annette Island, Alaska. Personnel from the MSD, U.S. Coast Guard Civil Engineering Unit (CEU) in Juneau, AK; and the Federal Aviation Administration's (FAA) Anchorage office, responded and conducted an inspection of the site on February 25, 1999 and a more detailed inspection on March 25, 1999. These inspections revealed three six-inch pipelines that were in very poor condition. The pier, upon which the pipeline ran, had deteriorated to the point where the pipelines were resting on the bottom of Tamgas Harbor and the shore side supports were either non-existent or they had shifted position to where they were no longer providing any support to the pipeline.

These pipelines had been used to carry product to/from a fuel storage area to the end of the pier (the total distance from the fuel storage tanks to the end of the pipeline was estimated at 4000 ft). The pipelines were of a welded construction with no visible flanges. Where the pipelines

crossed the pier access road they were buried. In this same area, investigators observed what was described as a "road boil". This boil was an area that appeared to have heavy oil contamination and would create a sheen when ever it rained.

According to information received from the FAA, the US Army Corps of Engineers (ACOE) had cold tapped and pulled sample from these pipelines and determined them to be contain petroleum products (gas and diesel). The ACOE also took samples of the soil around the road boil and discovered that this soil was also contaminated by diesel residual petroleum products.

Coast Guard Investigators learned that the abandoned marine transfer facility had been operated by Standard Oil (later became Chevron of California) until around 1973. This company had reportedly leased the facility from the FAA. Additionally, because the land was part of the Annette Island Indian Reservation, the Bureau of Indian Affairs was the owner of the property. Coast Guard investigators observed several labels (Chevron and Standard Oil) on the piping, manifold system, and the storage tanks.

After 1973, the history of the facility is not clear. Some of the local residents interviewed by Coast Guard personnel indicated that the Metlakatla Indian Community might have operated the facility for a couple of years following the departure of Chevron.

B. ACTION TAKEN

1. Declaration of Imminent Threat. Based on the information obtained by USCG pollution investigators, the results of the ACOE's samples, and on the observations made during the site visit, the U. S. Coast Guard Federal On Scene Coordinator (FOSC) for Southeast Alaska, CDR David Eley, USCG, determined this piping to be an imminent and substantial threat of discharge. This threat was based on the subsistence gathering done in Tamgas Bay as identified below.

The FOSC contacted FAA and BIA representatives (enclosures (2) and (3)) advising them of his decision to declare the abandoned marine transfer piping as an imminent and substantial threat. This was done through the issuance of a Notice of Federal Interest. This Notice advised both agencies that they may be considered the responsible party for this incident and advised them of their rights and responsibilities under the Oil Pollution Act of 1990. Both organizations were offered the opportunity to respond to the threat.

The FAA and BIA both denied responsibility for the threat of discharge created by the pipeline. In a letter to the FOSC (Enclosure 4), the BIA acknowledged the threat represented by the pipeline, but stated that "an exhaustive study of all available records...." revealed no evidence that the BIA operated the pipeline under discussion and that the BIA did not intend to take action to remove the petroleum from the pipelines. The BIA letter recommend that the Coast Guard proceed with plans to eliminate this threat to the environment.

The FAA also acknowledged the threat presented by the pipelines and like the BIA did not admit to being the Responsible Party (Enclosure 5). In their letter to the FOSC, the FAA stated that their research had indicated that the marine transfer piping had been operated after 1976, when the FAA terminated their principle involvement on Annette Island. Additionally, the FAA stated

that their research indicated that "the entire facility was operated under the authority of the Bureau of Indian Affairs at all times after 1974".

Since the Coast Guard was not able to determine the Responsible Party, the FOSC made the decision to access the Oil Spill Liability Trust Fund (OSLTF) and initiate a removal of the oil filled abandoned marine transfer piping and to eliminate the imminent and substantial environmental threat posed by this pipeline.

2. Mobilization of Resources. The first step taken by the FOSC, after the OSLTF had been accessed, was to assess the extent of the environmental sensitivity of the area. To accomplish this, the FOSC enlisted the assistance of the Metlakatla Indian Community's (MIC) Environmental Protection Agency. Together, they determined that Tamgas Harbor was an area of high value to the local community and an environmentally sensitive area. The harbor is a vital subsistence and commercial shellfishing area. The harbor is also home to the Annette Island Fish Hatchery.

The FOSC concluded that due to the sensitive nature of the environment, in which the pipeline was located, protective response equipment would be needed on scene prior to any attempts to remove product from the pipelines. Alaska Commercial Divers Inc., was hired on April 22, 1999, and the full mobilization of response equipment was completed on April 25. A total of 1000ft of 18-inch skirt hard boom, 1000ft of sorbent boom, approximately 25 bales of sorbent pads and miscellaneous personal protective items and support equipment were transferred to the site. Security concerns necessitated that the equipment be placed in a 20ft connex box and a local security company contracted to provide site security.

3. Recovery Operations. After the response equipment had been mobilized, the contractor was directed to begin clearing debris and preparing the site so the removal operations could be safely accomplished. Containment areas were constructed around the shore side manifold and around the road boil. A storage area for oiled equipment was also constructed using sandbags and a 12mil plastic liner. All of this work was performed while the FOSC awaited a response to the Notices of Federal Interest that were issued to the FAA and BIA.

When no responsible party was located by April 29, 1999, the FOSC made the decision to proceed with removal operations. A Site Safety Plan was developed and each worker was briefed on the site safety concerns prior to going on site. The FOSC contacted the USCG Pacific Strike Team and requested their assistance with monitoring site safety and with conducting air monitoring. This assistance was necessary due to the unknowns associated with the abandoned facility.

On April 29, 1999, the first pipeline was accessed by removing the valve at the shore side manifold. Each of the three 6 inch pipelines was accessed in this way and petroleum products were recovered from each line. The removal operations plan called for the contractor to remove the product from the pipelines a section at a time. After each section (approximately 150ft) of pipe was cleared of oil, the cleared section was removed and placed in the lined storage area. Because of the configuration of the pipeline and the location of the pipes, removal operations started at the manifold and progressed towards the end of the pier.

The removal of the product was accomplished by breaking the flanges of the valves at the manifold and draining all possible product into fifty-five gallon drums. After this product was removed, a fiber optic camera was inserted into the pipeline and snaked into the pipe for 150 ft. This enabled the contractor to determine if there were any pockets of oil in the pipe and if so where they were located. After a pocket of oil was located, a pump hose was inserted and the product removed. Upon clearing each 150 ft section of piping, the pipe was cut using a cold cutting technique and the process repeated.

This procedure was chosen over other possible methods due to the unknown condition of the pipelines. In several areas, the pipelines were noted to have heavy insets or large areas of wastage. The portions of piping that were underwater showed signs of excessive corrosion, with some areas being unobservable as they were buried under debris from the pier. The FOSC was also concerned that if the hydraulic pressure in the lines was changed too drastically, the pipelines could rupture and release their contents into the harbor.

Due to the remote location and lack of sufficient overhead lighting, removal operations were conducted during daylight hours only. When operations were secured for the day a temporary plug was inserted into the pipeline to ensure no product was lost. Additionally, removal operations were halted several times to construct safe work areas or when severe weather threatened.

Once all of the above ground piping had been cleared and removed, a backhoe was used to excavate the piping that crossed underneath the pier access road. During this excavation, five additional pipelines were discovered. One of these pipes, a 6-inch line, ended in a flange with a concrete patch and appeared to be leaking product. This patched 6-inch line ended in the immediate vicinity of the road boil. Based on this new discovery, the decision was made to remove this patch and verify the presence of product in this line. Upon removal of the patch, approximately 100 gallons of an oily water mixture was removed from the pipe.

In addition to the six-inch pipe (thought to be the original transfer pipe), the five other pipelines were inspected for signs of leakage. Since no evidence of leaking was observed from these lines, they were not accessed. During this excavation process, approximately 39 cubic yards of suspected contaminated soil was removed and placed in a container with 12 mil plastic liner. Samples of the soil were sent for an analysis in preparation of proper disposal (Enclosure 4).

After completing the shore-side removal of all product and piping, operations commenced to secure and remove the product from the underwater sections of the piping. All of the product was recovered from the pipelines, and all pipelines that could be safely removed from the water, were removed and stored inside of a lined containment area.

4. Reclamation/Disposal/Demobilization. The recovery operations were completed on May 27, 1999. The Coast Guard worked with the MIC EPA representative to properly dispose of the soil. The soil analysis revealed the contamination levels in the soil to be insignificant. Based on this report, the MIC EPA agreed to take the soil and place it in an area controlled by the MIC EPA. The FAA, through their contractor, agreed to be responsible for the disposal of the piping

and other debris generated during the response. All areas that had been impacted by the recovery operations were restored. The roadbed was rebuilt using "D1" gravel and the area graded to allow for vehicular use. The command post, heavy equipment, storage trailer and all remaining equipment was removed from the site and returned to their pre-positioned locations. The recovered product was then removed from the site, properly labeled and packaged, and shipped south for proper disposal.

On May 27, 1999, representatives from the MIC Native Council, USCG, and MIC EPA conducted a final inspection of the site and all operations associated with the abandoned marine transfer facility in Tamgas Harbor. Following this site inspection, the removal operations were deemed to have been successful; the area determined to be cleaned and restored; and all operations were secured.

C. RESOURCES COMMITTED

1. US Coast Guard Resources. Enclosure (6) is a copy of the FOSC report to the Director, National Pollution Funds Center, detailing costs.
Number of Personnel Involved: 9
Man-hours expended: 379.5
CG Equipment Utilized: Miscellaneous pollution response and personal protective equipment, 26ft travel trailer that served as the on site command post; portable VHF-base station for command and control.

2. Contractor Resources.
Man-hours expended: 927.25
Equipment Utilized: For a detailed listing of equipment utilized see enclosure (7).

D. PROBLEMS ENCOUNTERED

1. Who was the Responsible Party? One of the biggest obstacles encountered during this response was "Who was the Responsible Party?" According to the initial reports that the Coast Guard received, the land was owned by the Bureau of Indian Affairs, who leased it to the Federal Aviation Administration, who sublet it to Standard Oil (which later became Chevron). Then in the early 1970s, Chevron vacated the facility. At this point the records of who was operating the facility get indistinct. Some information indicated that the Metalakatla Power and Light Company might have operated the facility for 3-5 years after Chevron left but we could not locate any records to support this information.

It was at this point that we turned to the lawyers at the National Pollution Funds Center. Under their advice, the Captain of the Port Southeast Alaska issued 2 Notices of Federal Interest. One was issued to the Bureau of Indian Affairs and one was issued to the Federal Aviation Administration. Both the Federal Aviation Administration and Bureau of Indian Affairs denied responsibility, but they supported the Coast Guard's effort to respond to this imminent and substantial threat and provided willing assistance during the recovery operations.

2. Unknowns. Because of the lack of any firm historical schematics of the marine transfer facility, it was unknown as to what would be found when the underground portions of the pipelines were excavated. These concerns proved to be valid when a maze of additional pipelines was discovered. Some of these pipes appeared to originate near the bulk liquid storage tanks and others continued up the main road towards the historical location of the main storage area that was in use during the end of WWII. Still other lines appeared to come from other directions. Fortunately, the majorities of these lines were intact and appeared to be in fair condition. Based on the apparent condition of the pipes and the lack of any information as to what the pipes might contain, the decision was made to leave these pipes untouched.

Additional problems were encountered when the underwater portions of the pipelines were excavated and removed. These portions of the pipelines were covered with debris from the pier and items that had been discarded over time. The presence of this debris caused some delay in the removal operation, as several sections of the pipeline had to be uncovered by divers using their hands. The debris also prohibited the divers from being able to get a visual assessment of the pipes condition and presented a safety hazard to the divers.

The condition of the pier was probably the most dangerous problem encountered. Because of the age of the pier and the lack of proper maintenance, most of the pier pilings were nothing more than hollow shells of rotten wood. These pilings had the outward appearance of being solid but when touched, they would sway to and fro. Great care had to be taken when working on the pipelines adjacent to these pilings.

E. SUMMARY OF RESPONSE

1. This response was an unqualified success for the Coast Guard. As a result of this recovery operation, approximately 1300 gallons of petroleum products, 39 cubic feet of contaminated soil and 4000 feet of contaminated pipeline were removed and a significant threat to the highly sensitive environment of Tamgas Harbor was eliminated. The area was restored to a condition that allowed for normal usage. The Coast Guard's standing in the local native community was enhanced, and the cooperative efforts among the various Federal Agencies involved emphasized the benefits of Federal Agencies working together.

ENCLOSURES

1. Annette Island Environmental Restoration Issues, Annette Island, Alaska, August 1997
2. Notice of Federal Interest issued to FAA, dated 31 March 1999
3. Notice of Federal Interest issued to BIA, dated 31 March 1999
4. Response from BIA, dated 28 April 1999
5. Response from FAA, dated 21 April 1999
6. FOSC Incident Report and Transmital
7. MSD Ketchikan Memorandum dated 15 April 1999.

U.S. Department of Transportation

United States Coast Guard

Commanding Officer
U.S. Coast Guard
Marine Safety Office

30 Sherwood Lane, Suite 2A
Juneau, AK 99801-8545
Staff Symbol
Phone:

COTP/OCMI
(907) 463-2450

COPY

16000

MAR 31 1999

Same letter to Bureau of Indian Affairs

Mr. Patrick Poe
Regional Administrator
Federal Aviation Administration
222 West 7th Avenue, No. 14
Anchorage, Alaska 99513-7587

Dear Mr. Poe:

As you are aware, Annette Island was used for over 30 years as a government defense and aviation facility. Site restoration is being undertaken to address the environmental impacts from these past activities. These efforts are the result of extensive coordination between several federal agencies; including, the Federal Aviation Administration, the Army Corps of Engineers, the Bureau of Indian Affairs and the Coast Guard. This cleanup is comprehensive and complete restoration will undoubtedly take time.

However, there is a section of the site that requires immediate action to avert an oil spill. During a recent visit, a survey team comprised of Coast Guard, ACOE and FAA observed deteriorated pipelines extending from an abandoned tank farm and out into Tamgas Harbor. Petroleum products within these pipelines need to be removed promptly to address the threat of a 4000 gallon oil spill into the environmentally sensitive Tamgas Harbor.

As the pre-designated Federal On-Scene Coordinator for oil and chemical spill emergencies in Southeast Alaska, it is my job to ensure the responsible party takes timely and appropriate action when there is an imminent and substantial threat of a spill (authority: 33 USC 1321, 40 CFR 300). In this case, mitigation may be the responsibility of your agency, the Bureau of Indian Affairs, or both.

I have asked our Ketchikan oil spill response contractor to prepare a scope of work and cost estimate to eliminate the threat of a spill from these pipelines. You may find it convenient and appropriate to use this contractor.

Given the poor condition of the pipes and the structures supporting them, I request that, as a minimum, all oil be removed from the abandoned pipelines by April 21, 1999. If you are unable to do this, I will, and then seek immediate reimbursement from your agency. Again, we are more than willing to help you develop an action plan and implement it.

ENCLOSURE(2)

I am not comfortable making this demand. Your agency has been very cooperative. In fact, members of the FAA first alerted us to the risk posed by these pipelines. But, given the nature of the threat, we can not wait for the planning and negotiation that is normal for remedial action.

Sincerely,

W. David Eley
Commander, U. S. Coast Guard
Captain of the Port
Southeast Alaska

Copy: ACOE, Alaska District
BIA
EPA, Anchorage
CGD17 (mo/dl)
Metlakatla Indian Community

U.S. Department of Transportation

United States Coast Guard

Commanding Officer
U.S. Coast Guard
Marine Safety Office

0. ood Lane, Suite 2A
Juneau, AK 99801-8545
Staff Symbol
Phone:

COTP/OCMI
(907) 463-2450

COPY

16000

MAR 31 1999

Mr. Stanley M. Speaks
Area Director
Bureau of Indian Affairs
911 N.E. 11th Avenue
Portland, Oregon 97232-4169

Dear Mr. Speaks:

As you are aware, Annette Island was used for over 30 years as a government defense and aviation facility. Site restoration is being undertaken to address the environmental impacts from these past activities. These efforts are the result of extensive coordination between several federal agencies; including, the Federal Aviation Administration, the Army Corps of Engineers, the Bureau of Indian Affairs and the Coast Guard. This cleanup is comprehensive and complete restoration will undoubtedly take time.

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I have asked our Ketchikan oil spill response contractor to prepare a scope of work and cost estimate to eliminate the threat of a spill from these pipelines. You may find it convenient and appropriate to use this contractor.

Given the poor condition of the pipes and the structures supporting them, I request that, as a minimum, all oil be removed from the abandoned pipelines by April 21, 1999. If you are unable to do this, I will, and then seek immediate reimbursement from your agency. Again, we are more than willing to help you develop an action plan and implement it.

ENCLOSURE(2)

16000

MAR 31 1999

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Sincerely,

W. David Eley
Commander, U. S. Coast Guard
Captain of the Port
Southeast Alaska

Copy: ACOE, Alaska District
FAA
EPA, Anchorage
CGD17 (mo/dl)
Metlakatla Indian Community

United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Portland Area Office
911 N.E. 11th Avenue
Portland, Oregon 97232-4169

IN REPLY REFER TO:

TAKE PRIDE IN AMERICA

APR 28 1999

W. David Eley
Commander, U.S. Coast Guard
Marine Safety Office
2760 Sherwood Lane, Suite 2A
Juneau, AK 99801-8545

Dear Commander Eley:

In light of the imminent and substantial threat of a spill from the abandoned pipelines at the dock area in Tamgas Harbor, I am concerned for the trust resources at risk. I am convinced that the U.S. Coast Guard (USCG) is capable of responding to this threat more quickly and efficiently, than other agencies. In addition to knowledge and experience with environmental problems of this kind, the USCG already has a qualified contractor to conduct this action. Consequently, Bureau of Indian Affairs (BIA) does not intend to take action to remove the petroleum from the pipelines at this time.

My staff is conducting an exhaustive study of all available records to determine the history of operations and leasing or use permits for Annette Island World War II facility. To date we have found no evidence that BIA ever operated the pipeline under discussion. While the U.S. Government holds the Annette Island Reserve in trust for the benefit of the Metlakatla Indian Community, BIA is not an owner or operator of the pipeline.

If you have any further questions in this matter please contact June Boynton, Portland Area Office Environmental Coordinator, at (503) 231-6749.

Sincerely,

Portland Area Director

ENCLOSURE(4)

U.S. Department
of Transportation
**Federal Aviation
Administration**

Office of the Regional Administrator
Alaskan Region

222 West 7th Avenue, #14
Anchorage, AK 99513-7587
Phone: (907) 271-5645
Fax: (907) 271-5113

APR 16 1999

Commander W. David Eley
United States Coast Guard
Captain of the Port
Southeast Alaska
2760 Sherwood Lane, Suite 2A
Juneau, Alaska 99801-8545

Dear Commander Eley:

Thank you for your letter of March 31, 1999. We were surprised by the Coast Guard's position on the immediacy of addressing the fuel pipelines near Tamgas Harbor. The Federal Aviation Administration (FAA), along with other federal agencies and the Metlakatla community, have worked towards a cooperative, comprehensive environmental restoration program for Annette Island. The interested parties have dedicated quite a bit of effort and forethought into integrated work plans so program needs would not be addressed in a piecemeal manner. While we understand the Coast Guard's statutory responsibility for preventing oil spills and pollution in our nation's waterways, our view of the critical nature of the circumstances differs from your own. Nevertheless, we concede that the Coast Guard's decision to move forward in this matter is entitled to substantial deference.

Unfortunately, we are not prepared to immediately arrange for the proposed work with the Coast Guard's favored contractor. As you are undoubtedly aware, the FAA ended its principal operations on Annette Island in 1974. The Coast Guard occupied the pre-eminent federal role on the island after the FAA's departure and enjoyed the benefit of the facility that is now in issue. Upon termination of operations, the FAA abandoned the tanks in place and this equipment was put to use by private fuel suppliers, for the benefit of one principal client, along with a limited number of smaller entities. That principal client, of course, was your own organization, the Coast Guard.

Our research indicates Standard Oil (whose successor company is Chevron) constructed the dock pipeline before 1974 under an agreement with the FAA. It also appears that Standard Oil, or perhaps Union Oil, continued to operate the pipeline after the FAA terminated its extended presence on the island in 1974. We understand that there was a local distributor (Annette Island Gas) involved in the transfer of the products off-loaded at this facility but that company has long since ceased to exist. This same research indicates that the entire facility was operated under the authority of the Bureau of Indian Affairs (BIA) at all times after 1974.

Any fuel remaining in the dock pipeline, built by Standard Oil, would have been placed there long after the FAA terminated its involvement with the operation. The FAA's only

ENCLOSURE(5)

association to the problem cited in your letter is past ownership of the South Tamgas Harbor Dock tanks. While ownership of the tanks and pipeline may be an issue, any fuel present exists purely as a result of operations conducted by a third party after 1974 and without the express consent of the FAA.

In accordance with the third party exceptions set out in 33 U.S.C. 1321(f), any cost of this proposed removal operation should be borne by Chevron, Union Oil, and/or Annette Island Gas as those companies actually operated the fuel transfer pipeline during the relevant period. While the information is incomplete, depending on the Coast Guard contracts in use at the time, your own organization may be considered a third party operator or owner of fuel at the site. The Coast Guard may have purchased fuel directly from Standard Oil and contracted with Annette Island Gas for delivery.

We do not believe any past tank ownership determination mandates the FAA underwrite this proposed removal operation. The actual owner of the dock pipeline (Standard Oil) should be primarily responsible. If you base your demand solely on pipeline ownership, you should deal with Standard Oil or BIA who may have taken over ownership of the pipeline after Standard Oil discontinued service. Ownership of the fuel is most likely Standard Oil. Other fuel owners could include Union Oil, Annette Island Gas, or even the Coast Guard.

In summary, the FAA never did, at any time, own or operate the pipelines at the dock, nor did we ever own any fuel in it. In addition, the dock pipelines were operated by others for many years after the FAA left the site in 1974.

Like the discomfort expressed in your own letter, it is disquieting for us to communicate such a fundamental disagreement to our sister agency. However, statutory law and plain equity dictates that someone other than the FAA pay for this removal.

Sincerely,

Patrick N. Poe
Regional Administrator

cc:
Howard Martin, AAL-7.2
Catharine Benediktsson, AAL-471
Garth Beyette, AAL-471
Russ Renk, AAL-471/NISC
Lucy Jean, AAL-471/JALCO
Jeff Benson, MIC
June Boynton, BIA
Bob Deering, USCG
Suzanne Beauchamp, COE
Mike Redmond, COE
Andrea Elconin, COE

U.S. Department of Transportation
United States Coast Guard

Commanding Officer
U.S. Coast Guard
Marine Safety Office Juneau

2760 Sherwood Lane, Suite 2A
Juneau, AK 99801-8545
Staff Symbol: POPS
Phone: (907) 463-2450
FAX: (907) 463-2445

16450

From: Commanding Officer, Coast Guard Marine Safety Office Juneau
To: Director, National Pollution Funds Center

MAR 17 2000

Subj: Forwarding of Financial Summary Report for FPN/CPN: J99040

1.) INCIDENT INFORMATION:

Federal Project No. / CERCLA Case No.: J99040
MSIS MC 99004779
Date of Incident: 24Mar99

MV N/A
Date OPA/CERCLA Actions started: 21Apr99
Date OPA/CERCLA Actions completed: 16Jun99

Location of Incident: Tamgas Harbor, Annette Island, AK
Material Involved: GAT, ODS

Quantity Discharged: 5 gal

Was there a Substantial Threat? ☒YES ☐NO
Water or Resource Affected: Tamgas Harbor

(Primary Unit Contact) Britt Henderson, MST2, USCG

(Telephone No) (907) 225-4496

2.) FUND INFORMATION

Total Authorized Ceiling: $240,000,000.00
Total Coast Guard Costs: $38,777.24
Total Contractor Costs: $200,683.35
Total OGA Costs: $0.00

Total Cost to the Federal Government: $239,460.59

3.)Source Designation Information

Has source been identified? ☒ Yes ☐ No If Yes, attach "Page 2 Source Information"
Has source been designated? ☐ Yes ☒ No

Submitted By: _____
Britt Henderson, MST2, USCG

FOSC's Approval
Approved By: _____
R. C. LORIGAN, CDR, USCG

Encl:

Copy: Commander, Seventeenth Coast Guard District (mor)

ENCLOSURE (6)

U.S. Department of Transportation

United States Coast Guard

Memorandum

CPOPS

Subject: TAMAGAS HARBOR PIPELINE OIL REMOVAL

Date: 04/15/99
6280

From: Supervisor, Marine Safety Detachment Ketchikan, Alaska

Reply to Attn. of: Supervisor, MSD
Ketchikan
P. Clark
225-4496

To: Captain of the Port Southeast Alaska

Via: Executive Officer, Marine Safety Office Juneau

Enclosed are the preliminary operational plan for the removal of oil from the Tamgas Harbor pipeline and associated cost estimate received from Alaska Commercial Divers Inc., on 15 April 1999. The work proposal and cost estimates are for removal of the product within the pipelines and does not reflect additional costs that may be incurred if further problems are detected upon initiation of recovery operations. Additionally, the cost estimate includes some items that may or may not be required for this operation. If these items are not used then the cost would be adjusted accordingly.

I am working with Alaska Commercial Divers and the Metlakatla Indian Community to make preparations to initiate removal operations on 22 April 1999, unless directed otherwise. If operations are initiated on this date, I will be submitting a request for Pacific Strike Team personnel assistance with air/hazard monitoring and cost documentation for the following week.

PATRICK W. CLARK

Encl: (1) 1) Alaska Commercial Divers, Inc., Operational Plan for Fuel Removal from WWII Tamgas Harbor Fueling Station
(2) Site Safety Plan for Oil Recovery Operation for Tamgas Harbor
(3) Invoice depicting estimated costs for recovery operations based on 40hr/wk.

ENCLOSURE(7)

ACD
Alaska Commercial Divers, Inc.
P.O. Box 9351 ✦ Ketchikan, AK 99901 ✦ e-mail: acd@ktn.net ✦ Phone (907) 247-0771 ✦ Fax (907) 225-0771

April 1, 1999

SUBJ.: ALASKA COMMERCIAL DIVERS, INC.
OPERATIONAL PLAN FOR FUEL REMOVAL
FROM WWII TAMGAS HARBOR FUELING STATION

Ref: (a) 29 CFR 1910.120 OSHA regulations for Hazardous Waste Operations and Emergency Response
(b) 40 CFR 31. 1 Worker Protection
(c) NIOSH/ OSHA/ USCG/ EPA Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities. (niosh 85-115)
(d) ADC Consensus Standards for Commercial Diving Operations
(e) Alaska Commercial Divers Safe Operations Handbook

Encl: (1) ACD Site Safety Plan for Oil Spill and Recovery Operations
(2) General Safety Rules for Defueling and Oil Recovery Operations

1. **Purpose.** To establish an operating plan and procedures to followed for the removal of fuel and underwater fueling pipe in the Tamgas Harbor WWII Army fueling depot located on Annette Island, Alaska.

2. **Background.** The Tamgas Harbor Fueling Depot site is an abandon Army ship and boat fueling site. Site has not been used for decades and is in a high state of disrepair. It has been determined, during site surveys by the U.S. Coast Guard, the Federal Aviation Administration and other regulatory agencies, that the three pipes leading from the fuel farm to the end of the fueling dock contain fuel. The fuel piping is six inches in diameter and approximately 1000 feet long. It has been estimated that pipes could contain up to 8000 gallons of a mixture of approximately 70 percent diesel and 30 percent gasoline. The fuel pipes leading from the fuel farm are above ground for approximately 200 feet until they lead under ground to cross a road. They are under ground for 100 feet and the resurface where they run to the dock and then disappear underwater. The pipes follow a badly rotted pier underwater for approximately 500 feet and then reappear out of the water at the end pier. Previous test indicate that at least two of the three pipes contain fuel. At the point where the pipes cross under the road, there appears that one of the pipes is leaking, as there is fuel seeping to the surface of the road.

3. **Scope of Work.** Defuel the three fuel pipes leading from the fuel farm to the end of the pier. Remove those sections of pipe in the water, after defueling. Dig up that section of pipe underneath road and insure that leak is stopped. Dispose of fuel in accordance with directions from USCG.

4. **Geography.** Tamgas harbor is readily accessible by road and or water. Terrain is moderately flat in all areas that require work. Heavy brush and small trees covers the first two hundred feet of the pipe, leading from the fuel farm. The deepest water that the pipes lay in is approximately 35 feet at mean high tide.

ENCLOSURE(/)

5. **Weather.** Temperatures generally range from 40 to 60 degrees. Southeast Alaska experiences a great deal of rain and wind on a regular basis. Water temperatures range from 40 to 50 degrees.

6. **COMMUNICATIONS.** See (Encl. 1)

7. **Safety.** See (Encl. 1 and 2)

8. **Defueling Operations.** All defueling operations will carried out in strict compliance with the procedures outlined in enclosure (1) and references (a) thru (c). All personnel involved in the actual defueling operations must hold current Hazwopper certification.

9. **Diving Operations.** All diving operations will be conducted in accordance with references (d) & (e).

10. **Defueling Operations Required Equipment Overview.**

a. Required manpower- 5

b. Required Vehicle Assets
   1. personnel truck
   2. backhoe
   3. forklift
   4. ACD dive boat (2 days)

c. Required defueling equipment
   1. M-8 Defueling pumps (2)
   2. 8 inch flange adapter kit for M-8 pump
   3. 20 ft Milvan containers (4)
   4. 55 Gallon drums (160)
   5. 2000 feet of hard type oil containment boom
   6. 8 hard boom anchors with 100 feet of line each
   7. 4 boom warning lights
   8. 2000 feet of soft type oil containment boom
   9. 40 bales of oil spill pads
   10. 400 feet of 2 inch defueling hose
   11. air compressor
   12. generator
   13. skiff
   14. hazardous material placards for barrels and milvan
   15. 100 sandbags
   16. pipe inspection remote video camera
   17. Explosive gas analyzer
   18. 52 x 52 SpillDeck for barrel filling

d. Required safety equipment
   1. lighted road barricades
   2. emergency medical kit to include burn kit
   3. level "d" protective clothing for 4 personnel (3 sets per man)
   4. respiratory masks for personnel in milvan
   5. wash down/ decontamination equipment for personnel decontamination

5. eye wash station
6. fire extinguishers
7. exclusion area cones
8. 52 x 52 SpillDeck for personnel decontamination
9. Pump sprayer for personnel decontamination

10. Defueling Operations and Pipe Removal Overview

Based on a site survey, conducted on 24 Mar 1999, the following plan is submitted:

1. Initially several days will be spent getting the equipment to the site and setting it up.
2. Set up oil containment booms in water in case pipe break underwater during defueling. Set up oil containment site around oil seepage area on access road.
3. Remove brush from around first two hundred feet of pipe.
4. Setup oil containment site at defueling site in case of spill. Stage oil spill containment supplies along pipes in case of pipe breakage or inadvertent spills.
5. Disconnect empty fuel line from valve at fuel farm and attach M-8 fuel pump and valve adapter kit.
6. Defuel section of pipes leading to road. During defueling pipes there will be two personnel at the pump site, two at milvan barrel filling site and one person roaming along the pipes to insure that no pipes begin leaking during defueling.
7. Video pipes to insure that they are empty.
8. Cap off fuel pipes
9. Using backhoe and manpower dig up road section where oil is seeping from apparent underground leak. Determine source of oil/gasoline leak and attempt to stop.
10. Move all defueling equipment and oil containment materials to new site near where pipes cross under the road.
11. Uncap fuel lines and defuel sections of pipes leading under the road.
12. Video pipes to insure that they are empty.
13. Disconnect flange on other side of road and begin defueling pipes and disconnecting sections as they are defueled. Conduct periodic checks with pipe camera to determine success level. Disconnected sections will be stacked on containment tarps to prevent any residual oil from seeping on the ground.
14. At final flange of pipes, prior to entry into water, restage the defueling site, and begin preps for defueling pipes in the water. Defuel pipes in water by forcing defueling hose to lowest section of pipes in the water.
15. Insure pipes are empty with video camera.
16. Securely cap off both ends of pipes.
17. Make preparations for diving operations.
18. Attach underwater lift bags to pipes. At high tide, fill lift bags, raise pipes one at a time and move to beach. Let tide go down and remove pipe from beach, in sections, and stack on oil containment tarps or spill deck.
19. Breakdown equipment, remove all boom in water, clean up site, transport milvan and full barrels to a yet to be determined disposal site.
20. Depart

GENERAL SAFETY RULES FOR TAMGAS HARBOR DEFUELING AND OIL RECOVERY OPERATIONS

I. General Personnel Safety Rules and Precautions

a. All personnel while in any designated exclusion zone or handling oil waste shall be in level D protective equipment and shall be properly certified to do so. Prior to initial entry into the zones, all personnel shall read and sign the Daily Site Safety Plan.

b. Personnel working inside spaces, that may contain fumes, will wear appropriate respiratory equipment.

c. There will be no smoking or open flames allowed with the exclusion or contamination reduction zones.

d. There will be no smoking or open flames within 50 feet of any oil waste storage facilities.

e. All personnel working on or near water, deeper than three feet, shall wear appropriate approved flotation equipment.

f Any injuries or suspected illness, no matter how minor, should be reported to the site safety and health supervisor.

g. Beware of your surroundings. Avoid areas that may cause injuries from falls and tripping. Beware of and avoid moving machinery.

h. Hard hats will be worn when failing objects are possible.

i. Hearing protection will be worn in high noise level areas.

j. Should you feel that any action is unsafe or that a potential unrecognized hazard exists, cease work immediately, and inform the on site coordinator and or site safety manager.

2. General Machinery and Defueling Rules and Precautions

a. Equipment operators shall be aware of all personnel working around or near the machinery they or operating.

b. No open flames or spark producing devices within 50 feet of defueling operations or fuel storage areas.

c. Hard hats will be worn when operating heavy machinery.

d. Items, such as generator sets , will be kept at least 50 from defueling and storage sites.

e. While operating boats or skiffs appropriate approved flotation devises.

f. All equipment shall be inspected and functioning properly before using.

Alaska Commercial Divers, Inc
SITE SAFETY PLAN FOR OIL RECOVERY OPERATIONS
For Tamgas Harbor

To all ACD, Inc employees and their Sub-Contractors:

This site safety plan contains the necessary information, per OSHA and NCP requirements to NOAA-HAZMAT personnel working on an oil spill site. After reading and understanding it sign your name on the sign-up sheet on the last page.

SITE DESCRIPTION

Location: Tamgas Harbor, Annette Island, Alaska
Hazards: See attached sheets
Oil: Diesel and Avgas
Treatment chemicals: Soap and Water
Other Hazards: See General Safety Rules and Procedures, Page (4 and 5)

Surrounding population: N/A, Remote Site
Topography: Flat with rocky beaches and heavy brush

SITE ORGANIZATION

Function and Name	Phone Number	Other Information
On Site Coordinator (OSC):		
Scientific Support Coordinator:		
Responsible Party: Alaska Commercial Divers, Inc.	907-247-0771	
Site Safety:		
Dive Supervisor:		

ENTRY OBJECTIVES

1. Defuel the three pipes leading from the fuel farm to the end of the old dock.
2. Remove fuel lines from the water
3. Dispose of recovered fuels

ENCLOSURE(2)

SITE CONTROL

1. ***Reporting:*** Anyone entering or departing a work area, or associated control zones, shall report to the site supervisor.

2. ***Site Safety Plan:*** No person shall enter, a site without subscribing to this or another approved Site Safety and Health plan.

3. ***Training:*** No person shall enter a site without adequate training in hazardous waste operations safety and health; based on work assignment and applicable hazardous conditions.

4. ***Site Boundaries:*** The following control boundaries have been established, and should be marked as follows:

a.	Exclusion Zone:	**Red** Surveyor's Tape and Red Traffic Cones
b.	Contamination Reduction Zone:	**Yellow** Surveyor's Tape
c.	Support Zone:	**Green** Surveyor's Tape

The above zones shall be marked as needed to control traffic and enforce decontamination procedures. Appropriate placards, barricades, traffic cones, and/or boundary tape shall be used for this purpose.

5. ***Site Map:*** The site safety map is attached and shall be modified as necessary for each sector by the site safety supervisor when any of the following are modified:

a. Exclusion Zone boundaries

b. Contamination Reduction Zone: Boundaries, decontamination layout, equipment storage, temporary waste storage areas, washing, toilets and hygiene facilities.

c. Support Zone: Boundaries, first aid stations, emergency fire fighting equipment, command posts/office spaces, new equipment staging/storage, eating/rest areas.

d. Location of unidentified hazards: Underground cables, overhead cables, pits, trenches, open holes/hatches, wasted deck plate, hearing protection areas, hard hat areas, suspected locations of poisonous plants, insects; or animals, high pressure wash areas, and dispersant application areas.

HAZARD EVALUATION

CHEMICAL HAZARDS

__X__ ***Oils containing benzene***: including crude, gasoline, military JP4, commercial JET B, aviation gasoline and gas oils.

Composition: Composed of an indefinite petroleum distillate mixture. May contain benzene, toluene, xylene, naphthalenes, & PolyAromatic Hydrocarbons (PAHs) in concentrations that may vary widely depending on the source of the oil, weathering, and aging.

Hazard Description: May cause dermatitis by skin contact; nausea by inhalation; and eye irritation. Benzene is a hematological toxin (it affects the blood and blood forming organs), and is a carcinogen. The most important potential benzene, toluene, or xylene hazard is in poorly ventilated areas (such as pits or under docks), or around freshly spilled oil. Benzo(a)pyrene is a skin contact hazard and potentially may cause skin cancer with chronic skin contact. As oil weathers and ages, benzo(a)pyrene becomes more concentrated because it evaporates much slower than other chemicals in the mixture.

Basic Precaution: Stay away from, or upwind of, fresh oil spills; wear chemical resistant clothing as necessary to protect against skin or eye contact; periodically change protective clothing that has oil on it; immediately change clothing that is showing evidence of oil penetrating to your skin; and wash skin with soap and water when changing into street clothing, before eating/drinking, or when exiting to a contamination reduction zone. Flush eyes with water if oil gets in them. If ingested do not induce vomiting- contact a physician. Urine phenol should be tested as soon as possible (and not later than 72 hours after exposure) if there is a suspected overexposure to benzene.. Urine specific gravity should be corrected to 1.024 for this test. If urine phenol values exceed 75 mg per liter further testing in accordance with 29 CFR 1910.1028(i)(4) may be needed, and individuals must be removed from areas of potential benzene exposure until values return to normal.

__X__ ***Oil not containing benzene:*** including kerosene, diesels, military JP5, commercial JET A.

Composition: Composed of an indefinite petroleum distillate content typically including Po]yAromatic Hydrocarbons (PAHs). The concentration of 'these products will vary widely depending on the source of the oil, weathering, and aging.

Hazard Description: May cause dermatitis by skin contact; nausea by inhalation; and eye irritation by contact. Benzo(a)pyrene is a skin contact hazard and potentially may cause skin cancer with chronic skin contacts

Basic Precaution: Wear chemical resistant clothing as necessary to protect against skin or eye contact; periodically change protective clothing that has oil on it; immediately change clothing that is showing evidence of oil penetrating to your skin;,and wash skin with soap and water when changing into street clothing, before eating/drinking, or when exiting to a contamination reduction zone. Flush eyes with water if oil gets in them. If ingested do not induce vomiting- contact a physician..

GENERAL SAFETY RULES FOR DEFUELING AND OIL RECOVERY OPERATIONS AT TAMGAS HARBOR

l. General Personnel Safety Rules and Precautions

a. All personnel while in any designated exclusion zone or handling oil waste shall be in level D protective equipment and shall be properly certified to do so. Prior to initial entry into the zones, all personnel shall read and sign the Daily Site Safety Plan.

b. Personnel working inside spaces, that may contain fumes, will wear appropriate respiratory equipment.

c. There will be no smoking or open flames allowed with the exclusion or contamination reduction zones.

d. There will be no smoking or open flames within 50 feet of any oil waste storage facilities.

e. All personnel working on or near water, deeper than three feet, shall wear appropriate approved flotation equipment.

f. Any injuries or suspected illness, no matter how minor, should be reported to the site safety and health supervisor.

g. Beware of your surroundings. Avoid areas that may cause injuries from falls and tripping. Beware of and avoid moving machinery.

e. Hard hats will be worn when failing objects are possible.

f. Hearing protection will be worn in high noise level areas.

g. Should you feel that any action is unsafe or that a potential unrecognized hazard exists, cease work immediately, and inform the on site coordinator and or site safety manager.

2. General Machinery and Defueling Rules and Precautions

a. Equipment operators shall be aware of all personnel working around or near the machinery they or operating.

b. No open flames or spark producing devices within 50 feet of defueling operations or fuel storage areas.

c. Hard hats will be worn when operating heavy machinery.

d. Items, such as generator sets , will be kept at least 50 from defueling and storage sites.

e. While operating boats or skiffs appropriate approved flotation devises.

f. All equipment shall be inspected and functioning properly before using.

EMERGENCY PROCEDURES

1.. ***Emergency Medical Procedures:***

-Do not attempt to move seriously injured personnel, call for an ambulance to come to the injured person.

2. ***Emergency Fire Procedures***:

-DO NOT attempt to fight fires other than small fires. A small fire is generally considered to be a fire in the early stages of development, which can readily be extinguished with personnel and equipment in the immediate area in a few minutes time.

- Alert nearby personnel to call fire department.

In Any Emergency *if Possible*, the Correct Procedure Is to Call 911.

The Following Is Supplementary Information Only

EMERGENCY PHONE NUMBERS:

All Emergencies, Central Dispatch 911 and VHF Ch 16 & 12

US Coast Guard Emergency ONLY	**225-5666**	
Ketchikan General (ask for E. R.)	**225-5171**	
Metlakatla Police	**907-886-4011**	
Metlakatla Medical Clinic	**907-886-7922**	
Metlakatla Fire Department	**907-886-4741**	
State Troopers Tactical Diving Unit	**225-5118**	
Alaska Commercial Divers Office	**247-0771**	(Karen or Greg)

EMERGENCY TRANSPORTATION:

Air Rescue:	Temsco Helicopters Inc Chopper to Ketchikan and fixed wing to Seattle	**VHF CH 16 & 12 or 225-5141**
Sea Rescue:	US Coast Guard	**VHF CH 16 & 12 or 225-5666**
Land Rescue:	Ketchikan Fire Department	**Call 911**

State type of emergency and which dock or site for patient pick-up

CHAMBERS:

Seattle's Virginia Mason Hospital	**1-206-583-6543 (24 Hr Hotline)** 1-206-624-1144 (Non- emergency)
Diving Doctor	**Dr. Neal Hampson**
Operations Manager	**Richard Dunford**
Juneau's Barlet Memorial	**1-907-586-8427 (Emergancy Room)**
Repiratory Therapist / Supervisor	1-907-586-8431 **Dave Job**
Alaska Salvor	Dell Hanson 225-3667

*3. **Phone Communication:***

On-Scene Coordinator:

On-Site Cell phone Number	907-254-0194
Invader I Dive vessel Cell Number	907-254-0195
ACD Office Number	907-225-0771
Emergency Pager Numbers	(907) 228-2593 228-2782 228-3763

Site Safety and Health Officer:

Pager Number	(907) 228-2782

Agency for Toxic Substance and Disease Registry (ATSDR)

(404)639- 0615 (24 hr) Voice
(404)639- 0655 Fax

ATSDR can provide emergency medical and toxicological, information, assist in determining procedures for potential chemical over exposures, and can provide on scene assistance for certain chemical emergencies

SIGN UP SHEET

Team Member (Print Name)	Contact Number (phone, pager)	Signature	Date

References:

(a) 29 CFR 1910.120 OSHA regulations for Hazardous Waste Operations and Emergency Response (HAZWOPER)

(b) 40 CFR 31 1 Worker Protection

(c) NIOSH/OSHA/USCG/EPA Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities.(NIOSH 85-115)

(d) Alaska commercial Divers Operational Plan for fuel Removal from WWII Tamgas Harbor Fueling Station dated April 1, 1999.

Alaska Commercial Divers Inc
PO Box 9351
Ketchikan, AK 99901
907-247-0771
907-225-0771 Fax

Statement

DATE

4/15/99

TO:

USCG Commanding Officer MSO Juneau
2760 Sherwood Lane Suite 2A
Juneau, AK 99801-8545
Attn: MSTC Jerome

AMOUNT DUE	TERMS
$141,938.00	*Net 30*

DATE	TRANSACTION	AMOUNT	BALANCE
03/15/99	*Balance forward*		*0.00*
	TAMGAS HARBOR-		
04/11/99	*INV #2414 - Tamgas Harbor: BOA PERSONNEL Costs*	*67,040.00*	*67,040.00*
04/12/99	*INV #2415 - Tamgas Harbor: BOA CONTRACT CHARGES (Non-Labor)*	*38,109.00*	*105,149.00*
04/13/99	*INV #2416 - Tamgas Harbor: Other charges not on BOA*	*36,789.00*	*141,938.00*

CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	AMOUNT DUE
141,938.00	*0.00*	*0.00*	*0.00*	*0.00*	*$141,938.00*

ENCLOSURE(3)

Alaska Commercial Divers Inc
PO Box 9351
Ketchikan, AK 99901
907-247-0771
907-225-0771 Fax

Invoice

DATE	INVOICE #
4/11/99	2414

BILL TO

USCG Commanding Officer MSO Juneau
2760 Sherwood Lane Suite 2A
Juneau, AK 99801-8545
Attn: MSTC Jerome

FPN/CPN	PO/Contract #	BOA Contract #	TERMS
		DTCG8998A68F921	Net 30

ITEM	QTY	DESCRIPTION	RATE	AMOUNT
		Tamgas Harbor: *BOA PERSONNEL COSTS based on FOUR 40 hour work weeks*		
0002AA	160	*Skill Labor Straight Time Rate*	74.00	11,840.00
0002AA	160	*Skill Labor Straight Time Rate*	74.00	11,840.00
0002AA	160	*Skill Labor Straight Time Rate*	74.00	11,840.00
0004AA	160	*Foreman Straight Time Rate - Blair Oakes*	81.00	12,960.00
0005AA	160	*Supervisor Straight Time Rate - Greg Updike*	116.00	18,560.00
		TOTAL LABOR COSTS for 4 weeks, 40 hrs/week with Crew of 5		67,040.00

ESTIMATE -Invoice will be actual costs only.

TOTAL $67,040.00

Alaska Commercial Divers Inc
PO Box 9351
Ketchikan, AK 99901
907-247-0771
907-225-0771 Fax

Invoice

DATE	INVOICE #
4/12/99	2415

BILL TO

USCG Commanding Officer MSO Juneau
2760 Sherwood Lane Suite 2A
Juneau, AK 99801-8545
Attn: MSTC Jerome

FPN/CPN	PO/Contract #	BOA Contract #	TERMS
		DTCG8998A68F921	Net 30

ITEM	QTY	DESCRIPTION	RATE	AMOUNT
		Tamgas Harbor:		
		BOA CONTRACT CHARGES (Non-Labor)		
0035AA/DAY	20	*Vehicle Charge Operating Rate Per Day*	100.00	2,000.00
0032AJ/DAY	10	*Invader workboat Operating Rate Per Day*	1530.00	15,300.00
0033AF/DAY	20	*SKIFF 14' (25 HP) Operating Rate Per Day*	500.00	10,000.00
0027AI/WK	4	*250 CFM Air Compressor Operating Rate Per Week*	696.00	2,784.00
0025AA/WK	4	*3 KW Generator Operating Rate Per Week*	130.00	520.00
0043AP/Week	4	*Chian Saw Operating Rate Per Week*	213.00	852.00
0039AA/Week	4	*Electric Copus Blower Use per Week*	60.00	240.00
		EQUIPMENT TOTAL		31,696.00
0043AD	4	*"Haz Materials" Plastic Bags Per Box*	47.00	188.00
0047AE	25	*5" X10' Boom, Charged per bail - 4 booms per bail*	129.00	3,225.00
0047AF	50	*Square Sorbent Pads/per Bale*	60.00	3,000.00
		MATERIALS TOTAL		6,413.00
		Government Agency, NO TAX	0.00%	0.00

ESTIMATE -Invoice will be actual costs only.

TOTAL $38,109.00

Alaska Commercial Divers Inc
PO Box 9351
Ketchikan, AK 99901
907-247-0771
907-225-0771 Fax

Invoice

DATE	INVOICE #
4/13/99	2416

BILL TO

USCG Commanding Officer MSO Juneau
2760 Sherwood Lane Suite 2A
Juneau, AK 99801-8545
Attn: MSTC Jerome

FPN/CPN	PO/Contract #	BOA Contract #	TERMS
		DTCG8998A68F921	Net 30

ITEM	QTY	DESCRIPTION	RATE	AMOUNT
		Tamgas Harbor:		
		OTHER CHARGES; TWO Pages [Not on Current BOA Contract]		
		EQUIPMENT - Page 1		
Misc BOA C...	1	*Backhoe rental per Month*	5750.00	5,750.00
Misc BOA C...	1	*Forklift rental/V-90 per Month*	2300.00	2,300.00
Misc BOA C...	4	*2" Air Diaphram pumps per WEEK #1*	500.00	2,000.00
Misc BOA C...	4	*2" Air Diaphram pumps per WEEK #2*	500.00	2,000.00
Misc BOA C...	3	*24' milvan container - Includes transportation to/from Site*	1360.00	4,080.00
Misc BOA C...	150	*55 gallon drum*	30.50	4,575.00
Misc BOA C...	4	*400' of 2" defueling hose - per WEEK*	720.00	2,880.00
Misc BOA C...	8	*Remote "Chaser" video camera for pipe inspection - per HOUR*	100.00	800.00
Misc BOA C...	30	*52 X 52 SpillDeck (for Personnel Decon Station) per DAY*	30.00	900.00
Misc BOA C...	30	*52 X 52 SpillDeck (for Defueling Site or Other) per DAY*	30.00	900.00
Misc BOA C...	1	*Portable toilet per MONTH*	1150.00	1,150.00
		EQUIPMENT TOTAL		27,335.00

ESTIMATE -Invoice will be actual costs only.

TOTAL

Alaska Commercial Divers Inc
PO Box 9351
Ketchikan, AK 99901
907-247-0771
907-225-0771 Fax

Invoice

DATE	INVOICE #
4/13/99	2416

BILL TO

USCG Commanding Officer MSO Juneau
2760 Sherwood Lane Suite 2A
Juneau, AK 99801-8545
Attn: MSTC Jerome

FPN/CPN	PO/Contract #	BOA Contract #	TERMS
		DTCG8998A68F921	Net 30

ITEM	QTY	DESCRIPTION	RATE	AMOUNT
		MATERIALS USED/OTHER EXPENSES - Page 2		
Misc BOA C...		*????? Barge KTN to Tamgas (R/T) to move Backhoe and Fork Lift*	5000.00	5,000.00
Misc BOA C...		*Disposal of contaminated pads and boom in Ketchikan*	200.00	200.00
Misc BOA C...		*Disposal of oil or fuel in Seattle (Based on 8000 gallons)*	1360.00	1,360.00
Misc BOA C...	1	*Emergency medical kit/includes burn kit (OSHA approved)*	150.00	150.00
Misc BOA C...	2	*Respiratory masks for personnel in milvan*	115.00	230.00
Misc BOA C...	1	*Misc materials for decon unit*	172.50	172.50
Misc BOA C...	1	*Eye wash station*	29.00	29.00
Misc BOA C...	6	*Fire extinguishers/5 lb. ABC*	70.00	420.00
Misc BOA C...	15	*Raingear*	15.00	225.00
Misc BOA C...	15	*Boots*	19.00	285.00
Misc BOA C...	5	*Eye protection units*	11.50	57.50
Misc BOA C...	5	*Ear protection units*	13.00	65.00
Misc BOA C...	360	*Gloves per pair*	3.50	1,260.00
		MATERIALS/OTHER EXPENSES TOTAL		9,454.00

ESTIMATE -Invoice will be actual costs only.

TOTAL $36,789.00

June 7, 1999

Ms. Karen Updike
Alaska Commercial Divers
5160 Shoreline Drive
P.O. Box 9351
Ketchikan, Alaska 99901

Soil Sampling
U.S. Coast Guard
Annette Island Fuel Line
Annette Island, Alaska
D&M Project No. 43307-001

Dear Ms. Updike:

On May 13, 1999, Alaska Commercial Divers gave authorization to Dames & Moore to perform soil sampling on Annette Island, Alaska in conjunction with removal of underground piping under a contract with the U.S. Coast Guard. The following report presents the results of this soil sampling.

SITE DESCRIPTION AND HISTORY

Alaska Commercial Divers has a contract with the U.S. Coast Guard to drain and remove a 6 to 8-inch diameter fuel line that runs from the ocean to holding tanks on the island. The pipeline is approximately 1,200 feet long, with approximately 100 feet of this length underground. During excavation of the underground portion of this pipeline, significant hydrocarbon contamination was encountered in the underlying soil. Under supervision of the U.S. Coast Guard, Alaska Commercial Divers removed and containerized approximately 40 yards of contaminated soil for offsite treatment and disposal, pending analysis. The excavation was subsequently back-filled.

Appendix II

OBJECTIVE AND SCOPE OF SERVICES

The objective of this investigation was to document the presence of the hydrocarbon contamination in the excavated soil. To achieve this objective, our Scope of Services consisted of the tasks described below.

Task 1 - Documentation: Dames & Moore personnel traveled to the site and documented the condition of the excavated soil. This soil is currently stored in soil bins at the site. Field notes and photos of the excavation site are attached to this report.

Task 2 - Soil Sampling: Dames & Moore collected two samples from each soil bin, for a total of four samples. The samples were labeled and placed in a cooler with blue ice for transfer to the analytical laboratory under standard chain-of-custody procedures. The samples were analyzed for diesel range organics (DRO) using Alaska Method AK 102, gasoline range organics (GRO) using Alaska Method AK101, benzene, toluene, ethylbenzene, and xylenes (BTEX) using EPA Method 8021, and total lead EPA 6020. The analytical results and completed chain of custody are attached to this report.

Task 3 - Reporting:
Verbal results were provided by North Creek Analytical on May 19, 1999 and reported to Alaska Commercial Divers on May 20, 1999. The following summarizes these results.

Table 1

Annette Island Pipeline Removal Soil Sampling Results

Analyte	Soil Bin #1 Location A (mg/kg)	Soil Bin #1 Location B (mg/kg)	Soil Bin #2 Location A (mg/kg)	Soil Bin #2 Location B (mg/kg dry)	Reporting Limits (mg/kg)
Gasoline Range Hydrocarbons	ND*	7.34	21.0	17.9	5.0
Benzene	ND*	ND*	ND*	ND*	0.0500
Toluene	ND*	ND*	ND*	0.0547	0.0500
Ethylbenzene	ND*	ND*	ND*	ND*	0.0500
Xylenes (total)	ND*	0.949	1.19	1.44	0.100
Diesel Range Hydrocarbons	217	202	463	339	4.00
Lead	15.3	11.7	22.7	18.3	0.500

*These analytes were not detected in the sample above the reporting limits provided.

Samples collected from the soil bins did not contain significant concentrations of concern for GRO, BTEX and lead. DRO concentrations above 200 mg/kg were found in all four samples.

This indicates that these soils must be remediated prior to disposal, and implies that the soil underlying the pipeline exceeds ADEC default cleanup levels.

Thank you for the opportunity to be of assistance. Please contact us if you have any questions.

Sincerely,

DAMES & MOORE

Kathleen C. French
Project Manager

DAMES & MOORE
A DAMES & MOORE GROUP COMPANY

P.O. Box 8758
Ketchikan, Alaska 99901
907 247 1569 Tel
907 247 9158 Fax

June 14, 1999

Ms. Karen Updike
Alaska Commercial Divers
5160 Shoreline Drive
P.O. Box 9351
Ketchikan, Alaska 99901

Soil Sampling
U.S. Coast Guard
Annette Island Fuel Line
Annette Island, Alaska
D&M Project No. 43307-001

Dear Ms. Updike:

On May 13, 1999, Alaska Commercial Divers gave authorization to Dames & Moore to perform soil sampling on Annette Island, Alaska in conjunction with removal of underground piping under a contract with the U.S. Coast Guard. The following report presents the results of this soil sampling.

SITE DESCRIPTION AND HISTORY

Alaska Commercial Divers has a contract with the U.S. Coast Guard to drain and remove a 6 to 8-inch diameter fuel line that runs from the ocean to holding tanks on the island. The pipeline is approximately 1,200 feet long, with approximately 100 feet of this length underground. During excavation of the underground portion of this pipeline, significant hydrocarbon contamination was encountered in the underlying soil. Under supervision of the U.S. Coast Guard, Alaska Commercial Divers removed and containerized approximately 40 yards of contaminated soil for offsite treatment and disposal, pending analysis. The excavation was subsequently back-filled.

OBJECTIVE AND SCOPE OF SERVICES

The objective of this investigation was to document the presence of the hydrocarbon contamination in the excavated soil. To achieve this objective, our Scope of Services consisted of the tasks described below.

Task 1 - Documentation: Dames & Moore personnel traveled to the site and documented the condition of the excavated soil. This soil is currently stored in soil bins at the site. Field notes and photos of the excavation site are attached to this report.

Task 2 - Soil Sampling: Dames & Moore collected two samples from each soil bin, for a total of four samples. The samples were labeled and placed in a cooler with blue ice for transfer to the analytical laboratory under standard chain-of-custody procedures. The samples were analyzed for diesel range organics (DRO) using Alaska Method AK 102, gasoline range organics (GRO) using Alaska Method AK101, benzene, toluene, ethylbenzene, and xylenes (BTEX) using EPA Method 8021, and total lead EPA 6020. The analytical results and completed chain of custody are attached to this report.

Task 3 - Reporting:
Verbal results were provided by North Creek Analytical on May 19, 1999 and reported to Alaska Commercial Divers on May 20, 1999. The following summarizes these results.

Table 1

Annette Island Pipeline Removal Soil Sampling Results

Analyte	Soil Bin #1 Location A (mg/kg)	Soil Bin #1 Location B (mg/kg)	Soil Bin #2 Location A (mg/kg)	Soil Bin #2 Location B (mg/kg)	Reporting Limits (mg/kg)
Gasoline Range Hydrocarbons	ND*	7.34	21.0	17.9	5.0
Benzene	ND*	ND*	ND*	ND*	0.0500
Toluene	ND*	ND*	ND*	0.0547	0.0500
Ethylbenzene	ND*	ND*	ND*	ND*	0.0500
Xylenes (total)	ND*	0.949	1.19	1.44	0.100
Diesel Range Hydrocarbons	217	202	463	339	4.00
Lead	15.3	11.7	22.7	18.3	0.500

* These analytes were not detected in the sample above the reporting limits provided.

Samples collected from the soil bins did not contain significant concentrations of concern for GRO, BTEX and lead. DRO concentrations above 200 mg/kg were found in all four samples. This indicates that these soils must be remediated prior to disposal, and implies that the soil underlying the pipeline exceeds ADEC default cleanup levels.

Thank you for the opportunity to be of assistance. Please contact us if you have any questions.

Sincerely,

DAMES & MOORE

Kathleen C. French
Project Manager

Attachments:
- Analytical Report
- Chain-of Custody
- Site Photographs
- Field Notes

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Seattle 18939 120th Avenue NE, Suite 101, Bothell, WA 98011-9508
425.420.9200 fax 425.420.9210
Spokane East 11115 Montgomery, Suite B, Spokane, WA 99206-4776
509.924.9200 fax 509.924.9290
Portland 9405 SW Nimbus Avenue, Beaverton, OR 97008-7132
503.906.9200 fax 503.906.9210
Bend 20354 Empire Avenue, Suite E-9, Bend, OR 97708-1883
541.383.9310 fax 541.382.7588

Dames & Moore-AK	Project:	Annette Island USCG	Sampled:	5/14/99
4845 North Tongass Hwy	Project Number:	not provided	Received:	5/18/99
Ketchikan, AK USA 99901	Project Manager:	Katy French	Reported:	5/19/99 14:45

ANALYTICAL REPORT FOR SAMPLES:

Sample Description	Laboratory Sample Number	Sample Matrix	Date Sampled
2-A	B905314-01	Soil	5/14/99
1-A	B905314-02	Soil	5/14/99
2-B	B905314-03	Soil	5/14/99
1-B	B905314-04	Soil	5/14/99

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Joy B Chang, Project Manager

North Creek Analytical, Inc.
Environmental Laboratory Network

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www.ncalabs.com

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425.420.9200 fax 425.420.9210
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4845 North Tongass Hwy	Project Number:	not provided	Received: 5/18/99
Ketchikan, AK USA 99901	Project Manager:	Katy French	Reported: 5/19/99 14:45

Gasoline Hydrocarbons (n-Hexane to <n-Decane) and BTEX by AK101 and EPA 8021B
North Creek Analytical - Bothell

Analyte	Batch Number	Date Prepared	Date Analyzed	Surrogate Limits	Reporting Limit	Result	Units	Notes*
2-A			**B905314-01**				**Soil**	
Gasoline Range Hydrocarbons	0590463	5/18/99	5/18/99		5.00	**21.0**	mg/kg dry	1
Benzene	"	"	"		0.0500	ND	"	
Toluene	"	"	"		0.0500	ND	"	
Ethylbenzene	"	"	"		0.0500	ND	"	
Xylenes (total)	"	"	"		0.100	**1.19**	"	
Surrogate: 4-BFB (FID)	"	"	"	*60.0-120*		*120*	%	
Surrogate: a,a,a-TFT (FID)	"	"	"	*50.0-150*		*41.8*	"	*2*
Surrogate: 4-BFB (PID)	"	"	"	*60.0-120*		*97.7*	"	
Surrogate: a,a,a-TFT (PID)	"	"	"	*50.0-150*		*44.7*	"	*2*
1-A			**B905314-02**				**Soil**	
Gasoline Range Hydrocarbons	0590463	5/18/99	5/18/99		5.00	ND	mg/kg dry	3
Benzene	"	"	"		0.0500	ND	"	
Toluene	"	"	"		0.0500	ND	"	
Ethylbenzene	"	"	"		0.0500	ND	"	
Xylenes (total)	"	"	"		0.100	ND	"	
Surrogate: 4-BFB (FID)	"	"	"	*60.0-120*		*109*	%	
Surrogate: a,a,a-TFT (FID)	"	"	"	*50.0-150*		*64.1*	"	
Surrogate: 4-BFB (PID)	"	"	"	*60.0-120*		*106*	"	
Surrogate: a,a,a-TFT (PID)	"	"	"	*50.0-150*		*74.8*	"	
2-B			**B905314-03**				**Soil**	
Gasoline Range Hydrocarbons	0590463	5/18/99	5/18/99		5.00	**17.9**	mg/kg dry	1
Benzene	"	"	"		0.0500	ND	"	
Toluene	"	"	"		0.0500	**0.0547**	"	
Ethylbenzene	"	"	"		0.0500	ND	"	
Xylenes (total)	"	"	"		0.100	**1.44**	"	
Surrogate: 4-BFB (FID)	"	"	"	*60.0-120*		*111*	%	
Surrogate: a,a,a-TFT (FID)	"	"	"	*50.0-150*		*43.8*	"	*2*
Surrogate: 4-BFB (PID)	"	"	"	*60.0-120*		*94.2*	"	
Surrogate: a,a,a-TFT (PID)	"	"	"	*50.0-150*		*47.5*	"	*2*
1-B			**B905314-04**				**Soil**	
Gasoline Range Hydrocarbons	0590463	5/18/99	5/18/99		5.00	**7.34**	mg/kg dry	3
Benzene	"	"	"		0.0500	ND	"	
Toluene	"	"	"		0.0500	ND	"	
Ethylbenzene	"	"	"		0.0500	ND	"	
Xylenes (total)	"	"	"		0.100	**0.949**	"	

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**Refer to end of report for text of notes and definitions.*

Joy B Chang, Project Manager

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Seattle 18939 120th Avenue NE, Suite 101, Bothell, WA 98011-9508
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Spokane East 11115 Montgomery, Suite B, Spokane, WA 99206-4776
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541.383.9310 fax 541.382.7588

Dames & Moore-AK	Project:	Annette Island USCG	Sampled: 5/14/99
4845 North Tongass Hwy	Project Number:	not provided	Received: 5/18/99
Ketchikan, AK USA 99901	Project Manager:	Katy French	Reported: 5/19/99 14:45

Gasoline Hydrocarbons (n-Hexane to <n-Decane) and BTEX by AK101 and EPA 8021B
North Creek Analytical - Bothell

Analyte	Batch Number	Date Prepared	Date Analyzed	Surrogate Limits	Reporting Limit	Result	Units	Notes*
1-B (continued)			**B905314-04**				**Soil**	
Surrogate: 4-BFB (FID)	*0590463*	*5/18/99*	*5/18/99*	*60.0-120*		*181*	*%*	*4*
Surrogate: a,a,a-TFT (FID)	*"*	*"*	*"*	*50.0-150*		*61.2*	*"*	
Surrogate: 4-BFB (PID)	*"*	*"*	*"*	*60.0-120*		*183*	*"*	*4*
Surrogate: a,a,a-TFT (PID)	*"*	*"*	*"*	*50.0-150*		*70.4*	*"*	

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Dames & Moore-AK	Project:	Annette Island USCG	Sampled: 5/14/99
4845 North Tongass Hwy	Project Number:	not provided	Received: 5/18/99
Ketchikan, AK USA 99901	Project Manager:	Katy French	Reported: 5/19/99 14:45

Diesel Hydrocarbons (C10-C25) by AK102
North Creek Analytical - Bothell

Analyte	Batch Number	Date Prepared	Date Analyzed	Surrogate Limits	Reporting Limit	Result	Units	Notes*
2-A			**B905314-01**				**Soil**	
Diesel Range Hydrocarbons	0590471	5/18/99	5/18/99		4.00	**463**	mg/kg dry	
Surrogate: 2-FBP	"	"	"	*50.0-150*		*109*	%	
1-A			**B905314-02**				**Soil**	
Diesel Range Hydrocarbons	0590471	5/18/99	5/18/99		4.00	**217**	mg/kg dry	
Surrogate: 2-FBP	"	"	"	*50.0-150*		*94.4*	%	
2-B			**B905314-03**				**Soil**	
Diesel Range Hydrocarbons	0590471	5/18/99	5/18/99		4.00	**339**	mg/kg dry	
Surrogate: 2-FBP	"	"	"	*50.0-150*		*97.5*	%	
1-B			**B905314-04**				**Soil**	
Diesel Range Hydrocarbons	0590471	5/18/99	5/18/99		4.00	**202**	mg/kg dry	
Surrogate: 2-FBP	"	"	"	*50.0-150*		*97.9*	%	

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Dames & Moore-AK	Project:	Annette Island USCG	Sampled: 5/14/99
4845 North Tongass Hwy	Project Number:	not provided	Received: 5/18/99
Ketchikan, AK USA 99901	Project Manager:	Katy French	Reported: 5/19/99 14:45

Total Metals by EPA 6000/7000 Series Methods
North Creek Analytical - Bothell

Analyte	Batch Number	Date Prepared	Date Analyzed	Specific Method	Reporting Limit	Result	Units	Notes*
2-A			**B905314-01**				**Soil**	
Lead	0590467	5/18/99	5/19/99	EPA 6020	0.500	**22.7**	mg/kg dry	
1-A			**B905314-02**				**Soil**	
Lead	0590467	5/18/99	5/19/99	EPA 6020	0.500	**15.3**	mg/kg dry	
2-B			**B905314-03**				**Soil**	
Lead	0590467	5/18/99	5/19/99	EPA 6020	0.500	**18.3**	mg/kg dry	
1-B			**B905314-04**				**Soil**	
Lead	0590467	5/18/99	5/19/99	EPA 6020	0.500	**11.7**	mg/kg dry	

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509.924.9200 fax 509.924.9290
Portland 9405 SW Nimbus Avenue, Beaverton, OR 97008-7132
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Dames & Moore-AK	Project:	Annette Island USCG	Sampled:	5/14/99
4845 North Tongass Hwy	Project Number:	not provided	Received:	5/18/99
Ketchikan, AK USA 99901	Project Manager:	Katy French	Reported:	5/19/99 14:45

Dry Weight Determination
North Creek Analytical - Bothell

Sample Name	Lab ID	Matrix	Result	Units
2-A	B905314-01	Soil	87.1	%
1-A	B905314-02	Soil	88.9	%
2-B	B905314-03	Soil	81.8	%
1-B	B905314-04	Soil	89.0	%

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Joy B Chang, Project Manager

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Spokane East 11115 Montgomery, Suite B, Spokane, WA 99206-4776
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Dames & Moore-AK	Project:	Annette Island USCG	Sampled: 5/14/99
4845 North Tongass Hwy	Project Number:	not provided	Received: 5/18/99
Ketchikan, AK USA 99901	Project Manager:	Katy French	Reported: 5/19/99 14:45

Gasoline Hydrocarbons (n-Hexane to <n-Decane) and BTEX by AK101 and EPA 8021B/Quality Control
North Creek Analytical - Bothell

Analyte	Date Analyzed	Spike Level	Sample Result	QC Result	Units	Reporting Limit Recov. Limits	Recov. %	RPD Limit	RPD %	Notes*
Batch: 0590463	**Date Prepared: 5/18/99**					**Extraction Method: EPA 5030B (P/T)**				
Blank	**0590463-BLK1**									
Gasoline Range Hydrocarbons	5/18/99			**ND**	mg/kg dry	**5.00**				
Benzene	"			**ND**	"	**0.0500**				
Toluene	"			**ND**	"	**0.0500**				
Ethylbenzene	"			**ND**	"	**0.0500**				
Xylenes (total)	"			**ND**	"	**0.100**				
Surrogate: 4-BFB (FID)	"	*6.25*		*5.61*	"	*60.0-120*	*89.8*			
Surrogate: a,a,a-TFT (FID)	"	*6.00*		*5.33*	"	*50.0-150*	*88.8*			
Surrogate: 4-BFB (PID)	"	*6.25*		*6.17*	"	*60.0-120*	*98.7*			
Surrogate: a,a,a-TFT (PID)	"	*6.00*		*6.49*	"	*50.0-150*	*108*			
LCS	**0590463-BS1**									
Benzene	5/19/99	1.25		1.13	mg/kg dry	60.0-120	90.4			
Toluene	"	1.25		1.15	"	60.0-120	92.0			
Ethylbenzene	"	1.25		1.20	"	60.0-120	96.0			
Xylenes (total)	"	3.75		3.52	"	60.0-120	93.9			
Surrogate: 4-BFB (PID)	"	*6.25*		*5.92*	"	*60.0-120*	*94.7*			
Surrogate: a,a,a-TFT (PID)	"	*6.00*		*6.29*	"	*50.0-150*	*105*			
LCS	**0590463-BS2**									
Gasoline Range Hydrocarbons	5/19/99	62.5		53.2	mg/kg dry	60.0-120	85.1			
Surrogate: 4-BFB (FID)	"	*6.25*		*6.27*	"	*60.0-120*	*100*			
Surrogate: a,a,a-TFT (FID)	"	*6.00*		*5.93*	"	*50.0-150*	*98.8*			
LCS Dup	**0590463-BSD1**									
Benzene	5/19/99	1.25		1.24	mg/kg dry	60.0-120	99.2	20.0	9.28	
Toluene	"	1.25		1.26	"	60.0-120	101	20.0	9.33	
Ethylbenzene	"	1.25		1.32	"	60.0-120	106	20.0	9.90	
Xylenes (total)	"	3.75		3.87	"	60.0-120	103	20.0	9.24	
Surrogate: 4-BFB (PID)	"	*6.25*		*6.33*	"	*60.0-120*	*101*			
Surrogate: a,a,a-TFT (PID)	"	*6.00*		*6.65*	"	*50.0-150*	*111*			

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**Refer to end of report for text of notes and definitions.*

Joy B Chang, Project Manager

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425.420.9200 fax 425.420.9210
Spokane East 11115 Montgomery, Suite B, Spokane, WA 99206-4776
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Dames & Moore-AK	Project:	Annette Island USCG	Sampled: 5/14/99
4845 North Tongass Hwy	Project Number:	not provided	Received: 5/18/99
Ketchikan, AK USA 99901	Project Manager:	Katy French	Reported: 5/19/99 14:45

Diesel Hydrocarbons (C10-C25) by AK102/Quality Control
North Creek Analytical - Bothell

Analyte	Date Analyzed	Spike Level	Sample Result	QC Result	Units	Reporting Limit / Recov. Limits	Recov. %	RPD Limit	RPD %	Notes*
Batch: 0590471	**Date Prepared: 5/18/99**					**Extraction Method: EPA 3550B**				
Blank	**0590471-BLK1**									
Diesel Range Hydrocarbons	5/18/99			**ND**	mg/kg dry	**4.00**				
Surrogate: 2-FBP	"	*12.8*		*11.3*	"	*50.0-150*	*88.3*			
LCS	**0590471-BS1**									
Diesel Range Hydrocarbons	5/18/99	80.0		79.4	mg/kg dry	60.0-120	99.3			
Surrogate: 2-FBP	"	*12.8*		*9.78*	"	*50.0-150*	*76.4*			
LCS Dup	**0590471-BSD1**									
Diesel Range Hydrocarbons	5/18/99	80.0		75.5	mg/kg dry	60.0-120	94.4	20.0	5.06	
Surrogate: 2-FBP	"	*12.8*		*11.1*	"	*50.0-150*	*86.7*			

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**Refer to end of report for text of notes and definitions.*

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Dames & Moore-AK	Project:	Annette Island USCG	Sampled: 5/14/99
4845 North Tongass Hwy	Project Number:	not provided	Received: 5/18/99
Ketchikan, AK USA 99901	Project Manager:	Katy French	Reported: 5/19/99 14:45

Total Metals by EPA 6000/7000 Series Methods/Quality Control
North Creek Analytical - Bothell

Analyte	Date Analyzed	Spike Level	Sample Result	QC Result	Units	Reporting Limit / Recov. Limits	Recov. %	RPD Limit	RPD %	Notes*
Batch: 0590467	**Date Prepared: 5/18/99**					**Extraction Method: EPA 3050B**				
Blank	**0590467-BLK1**									
Lead	5/19/99			**ND**	mg/kg dry	**0.500**				
LCS	**0590467-BS1**									
Lead	5/19/99	25.0		26.5	mg/kg dry	80.0-120	106			
Matrix Spike	**0590467-MS1**		**B905314-01**							
Lead	5/19/99	19.5	22.7	41.6	mg/kg dry	70.0-130	**96.9**			
Matrix Spike Dup	**0590467-MSD1**		**B905314-01**							
Lead	5/19/99	19.3	22.7	39.6	mg/kg dry	70.0-130	**87.6**	20.0	**10.1**	

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503.906.9200 fax 503.906.9210
Bend 20354 Empire Avenue, Suite E-9, Bend, OR 97708-1883
541.383.9310 fax 541.382.7588

Dames & Moore-AK	Project:	Annette Island USCG	Sampled: 5/14/99
4845 North Tongass Hwy	Project Number:	not provided	Received: 5/18/99
Ketchikan, AK USA 99901	Project Manager:	Katy French	Reported: 5/19/99 14:45

Notes and Definitions

#	Note
1	The chromatogram for this sample does not resemble a typical gasoline pattern.
2	Extract was diluted due to high sample mass.
3	This sample appears to contain extractable diesel range organics.
4	The surrogate recovery for this sample cannot be accurately quantified due to interference from coeluting organic compounds present in the sample.
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
Recov.	Recovery
RPD	Relative Percent Difference

North Creek Analytical - Bothell

Joy B Chang, Project Manager

NORTH CREEK ANALYTICAL
Environmental Laboratory Services

18939 120th Avenue N.E., Suite 101, Bothell, WA 98011-9508 (425) 420-9200 FAX 420-9210
East 11115 Montgomery, Suite B, Spokane, WA 99206-4779 (509) 924-9200 FAX 924-9290
9405 S.W. Nimbus Avenue, Beaverton, OR 97008-7132 (503) 906-9200 FAX 906-9210

** TOTAL PAGE.03 **

CHAIN OF CUSTODY REPORT

Work Order # B905314

REPORT TO:	INVOICE TO:
ATTENTION: Katy French	ATTENTION: Michelle Harper
ADDRESS: P.O. Box 8758 Ketchikan, Alaska 99901	ADDRESS: 5600 B Street Anchorage, Alaska 99518 -
PHONE: 907-247-1589 FAX: 907-247-9158	P.O. NUMBER: NCA QUOTE #: 1611
PROJECT NAME: Annette Island. USCG	
PROJECT NUMBER:	
SAMPLED BY: Katy French	

TURNAROUND REQUEST in Business Days *
Organic & Inorganic Analyses: 10 (Standard) | 7 | 5 | 4 | 3 | 2 | 1 | Same Day
Fuels & Hydrocarbon Analyses: 5 (Standard) | 3-4 | 2 | 1 | Same Day
OTHER Specify:
* Turnaround Requests less than standard may incur Rush Charges.

	CLIENT SAMPLE IDENTIFICATION	SAMPLING DATE/TIME	NCA SAMPLE ID (Laboratory Use Only)	AK102	AK101/BTEX	Total Lead EPA 6010	MATRIX	# OF
1.	2-A	5/14/99 0800	B905314-01	X	X	X	S	2
2.	1-A	5/14/99 0800	02	X	X	X	S	2
3.	2-B	5/14/99 0800	03	X	X	X	S	2
4.	1-B	5/14/99 0800	04	X	X	X	S	2
5.								
6.								
7.								
8.								
9.								
10.								

For AK/WA Stds. 24 hour RUSH!

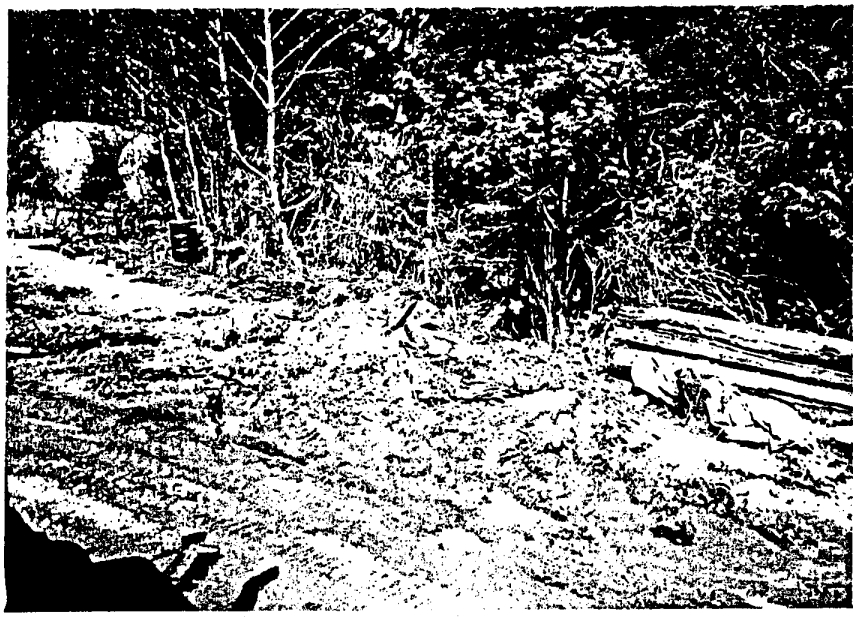
RELINQUISHED BY: Kathleen C. French	DATE: 5/17/99	RECEIVED BY: Shelly Frank	DATE: 5/17/99
PRINT NAME: Katy French FIRM: Dames & Moore	TIME: 10:55	PRINT NAME: FIRM:	TIME:
RELINQUISHED BY:	DATE:	RECEIVED BY: S. Wideen	DATE: 5/18/99
PRINT NAME: FIRM:	TIME:	PRINT NAME: S. Wideen FIRM: NCA	TIME: 945

ADDITIONAL REMARKS: AK101 / BTEX per Katy, 5/18, Jay

6.0° w/o

PAGE OF

Refueling Station. Annette Island, Metlakata, Alaska. Back-filled area seen at right after removal of underground piping.



Back-filled area in foreground after removal of underground piping. Refueling Station. Annette Island, Metlakatla, Alaska.

Back-filled area in foreground from center to left along brush line after removal of underground piping. Refueling Station. Annette Island, Metlakatla, Alaska.

Soil Bin #1. Refueling Station. Annette Island, Metlakatla, Alaska.

Soil Bin #2. Refueling Station. Annette Island, Metlakatla, Alaska.

Soil Bin #2 after sampling and ready for shipment. Refueling Station. Annette Island, Metlakatla, Alaska.

FRIDAY, MAY 14TH
PROJECT #: 43307-001

WEATHER - LIGHT WIND
NO PRECIPITATION
SUNNY & LIGHT CLOUDS

MORNING FLIGHT FROM PRO-MECH AIR
WITH ALASKA COMM. DIVERS CREW
TRUCK TO REFUELING STATION SITE.

ORIGINAL PLAN TO SAMPLE BELOW PIPELINE
AREA AFTER REMOVAL OF PIPELINE.
HOWEVER, AREA FOUND BACKFILLED. TWO
LARGE HALF-CONTAINERS FILLED WITH
SOIL FROM PIPELINE AREA. SOIL IN
CONTAINERS COVERED WITH PLASTIC TARPS.

SAMPLING AT LEVEL D

KG.

AFTER DISCUSSION WITH USCG SITE MGR, DETERMINED SAMPLE COLLECTION TO BE WITHIN THE TWO SOIL BINS.
PROCEEDED TO COLLECT SAMPLES AT 0800.

SOIL BIN #1

SAMPLE LOCATION A

PERSERVATIVE SERIAL AD 545154

SAMPLE LOCATION B

PRESERVATIVE SERIAL AD 544403

SOIL BIN #2

SAMPLE LOCATION A

PRESERVATIVE SERIAL 545143

SAMPLE LOCATION B

PRESERVATIVE SERIAL 497955

SAMPLES SEALED AND SECURED WITH FROZEN PACKS FOR TRANSPORT

KCJ.